UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 05-CV-40072 FDS

LANDWORKS CREATIONS, LLC)	
Plaintiff)	
V.	,)	DI A DIMITETA GEGOVID
UNITED STATES FIDELITY &) PLAINTIFF'S SECOND) REQUEST FOR PRODUCTION	
GUARANTY COMPANY	Y)	OF DOCUMENT TO DEFENDANT, USF & G
Defendant)	

Now comes the Plaintiff, Landworks Creations, LLC ("the Plaintiff") and requests that Defendant, United States Fidelity & Guaranty Co./St. Paul's Ins. Co ("the Defendant") provide the following documents pursuant to F. R. C. P. 34. If any document is deemed by the Defendant to be subject to a privilege of any kind, request is made for the creation and provision of a privilege log, containing specific information sufficient for the Plaintiff to understand the nature of the document, the date of creation of the document, the creator of the document and the general subject matter of the document:

Request 1: Any documents in the possession of USF & G which purports to be a termination letter of Landworks' services at the Shrewsbury project referenced in the Plaintiff's Complaint. Request 2: Any documents in the possession of USF & G which purports to demand that Landworks return to the Shrewsbury Project referenced in the Plaintiff's Complaint during the calendar year 2005.

Request 3: Any documents in the possession of USF & G in which Landworks states an unwillingness to return to the Shrewsbury Project referenced in the Plaintiff's Complaint during the calendar year of 2005.

Request 4: Any documents which serve as, or purports to serve as, policy manuals for surety claims adjustors in which the procedures and policies for investigation of claims on public projects in Massachusetts are stated.

Request 5: Any documents which demonstrate USF & G's compliance with any policy manuals identified in Request 4 with regard to Landworks' claim at the Shrewsbury Project referenced in the Plaintiff's Complaint.

Request 6: For each and every lawsuit in which USF & G was a party in a Massachusetts state court, either superior or district court, regarding a public surety claim, whether as a Plaintiff, Defendant or third-party Plaintiff or third-party Defendant, from 2001 to the present, provide the Complaint, the Answer, the Third-party Complaint and Answer or any and all cross-claims or counterclaims, as well as replies.

Request 7: Copies of any and all correspondence, including e-mail traffic, between any claims adjustor or agent of USF & G and any representative of Lovett Silverman from 2005-06 that in any way references Landworks.

Request 8: If any site work has been performed at the Shrewsbury Project which was within in the scope of Landworks' contract, provide any bids for performance of that work, contracts for performance of that work, invoices submitted for performance of that work and proof of payment for performance of that work.

Request 9: Please provide Lovett Silverman's file pertaining to its review of the site work at the Shrewsbury Project which is the subject of the Plaintiff's Complaint.

Case 4:05-cv-40072-FDS Document 27 Filed 03/21/2006 Page 3 of 4

Respectfully Submitted,

Landworks Creations, LLC

By its attorney,

Robert N. Meltzer, BBO #564745

PO Box 1459 Framingham, MA 01701 Phone: (508) 872-7116

Dated: February 7, 2006

CERTIFICATE OF SERVICE

I, Robert N. Meltzer, do hereby certify that on this day I served a copy of the foregoing on all counsel of record by mailing the same, postage prepaid, to:

Hermes, Netburn, O'Connor & Spearing 265 Franklin Street, Seventh Floor Boston, MA 02110-3113
Attn: Eric C. Hipp, Esq. ,

Robert N. Meltzer

February 7, 2006